

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ALMA T. MCBROOM,
PLAINTIFF

*
*

VS.

* CIVIL ACTION NO. 2:06 CV767-F

JOHN E. POTTER, POSTMASTER *
GENERAL UNITED STATES POSTAL *
SERVICE; NATIONAL POSTAL *
MAIL HANDLERS UNION; THE *
MONTGOMERY ALABAMA AREA *
LOCAL AMERICAN POSTAL WORKERS *
UNION, AFL-CIO; and VANESSA *
GORDON, *
DEFENDANTS *

REQUEST FOR ADMISSIONS

COMES NOW Defendant, VANESSA GORDON by and through
Counsel and request Plaintiff admit or deny the following
within 30 days after service of this request.

1. That the Local Union is not required to accompany,
represent or file a grievance on your behalf
pursuant to the Collective Bargaining Agreement in
force at the relevant time complained of. Exhibit 1
2. That Vanessa Gordon did in fact accompany,
represent you resulting in the document described
as "Mutual Agreement" Defendant's Exhibit 2
3. That you failed to follow up or contact VANESSA
GORDON after the "Mutual Agreement" was signed.

4. That you personally filed a grievance concerning your claim for compensation from the Postal Service.
5. That after December 31, 2004 you failed or refused to answer certified letters sent to you by your immediate supervisor concerning your alleged grievance.
6. That you in fact have not been determined to be totally disabled.
7. That you, in fact, could work.

3/29/07
DATE

/s/ William P. Roberts, II
SIGNATURE OF COUNSEL

COUNSEL FOR:
VANESSA GORDON
HOWELL, SARTO & HOWELL
P.O. Box 681864
147 E. Main St.
Prattville, AL 36068-1864
(334)365-2286

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon the following by U. S. Mail, first class, postage pre-paid and through the Court's electronic filing system:

Debrorah Nicknson
2820 Fairlane Drive, A-10
Montgomery, AL 36116

Brenda C. Zwack
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Dated: March 29, 2007 /s/ William P. Roberts, II